

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Adam Williams,

Plaintiff,

vs.

Tesla, Inc.; Tesla Motor, Inc.; Tesla, Inc. d/b/a  
Tesla Motors, Inc.; and John Does 1-5 and 6-10,

Defendants.

Case No. 1:18-cv-04120-JHR-AMD

**Via ECF**

**JOINT STIPULATION AND ORDER TO  
STAY DISCOVERY PENDING THE  
OUTCOME OF DEFENDANT'S  
MOTION TO COMPEL ARBITRATION**

The parties to this action, Plaintiff Adam Williams (“Plaintiff”) and Defendant Tesla, Inc.<sup>1</sup>, by and through their respective counsel of record, hereby stipulate to the following and request that their stipulation become an Order of this Court:

1. Plaintiff initiated this action in the Superior Court of New Jersey on or about January 27, 2018. Defendant was served with a Summons and a copy of the Complaint on February 21, 2018. Defendant removed to this Court on March 23, 2018. (ECF 1).

2. On April 13, 2018, Defendant filed a Motion to Compel Arbitration, which Plaintiff opposed on May 16, 2018. (ECF 6; ECF 11). This Motion is pending before the Honorable Joseph H. Rodriguez and is set for a May 21, 2018 Motion Day.

3. Counsel for Plaintiff Williams and Defendant Tesla, Inc. conferred and agreed to stay discovery pending the outcome of Defendant’s Motion.

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<sup>1</sup> The only proper defendant in this matter is Tesla, Inc. Tesla Motor, Inc. underwent a corporate name change and is now Tesla, Inc. References to Tesla throughout this Memorandum of Law include Defendants Tesla, Inc.; Tesla Motor, Inc.; and Tesla Inc. d/b/a Tesla Motor, Inc.

4. Based upon these representations, the parties request that this Court enter an Order approving this Joint Stipulation and Order to stay discovery in this action pending the outcome of Defendant's Motion to Compel Arbitration.

SO STIPULATED:

/s/ Toni L. Telles

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Attorneys for Defendants Tesla, Inc.; Tesla  
Motor, Inc.; Tesla, Inc. d/b/a Tesla Motors,  
Inc.

Dated: May 17, 2018

SO ORDERED:

Dated:

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The Honorable Ann Marie Donio, U.S.M.J.